

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

PLANNED PARENTHOOD OF THE
HEARTLAND, INC., and
JILL MEADOWS. M.D.,

Petitioners,

v.

TERRY E. BRANSTAD ex rel. STATE
OF IOWA and IOWA BOARD OF
MEDICINE,

Respondents.

Equity Case No. EQCE081503

JOINT STIPULATION

COME NOW Petitioners, Planned Parenthood of the Heartland, Inc. and Jill Meadows, M.D., and Respondents, Terry E. Branstad ex rel. State of Iowa and Iowa Board of Medicine (together “the Parties”), having met and conferred in advance of trial in the above-captioned matter, enter into the following Joint Stipulation:

1. The Parties stipulate that in lieu of live witness testimony, the written testimony by affidavit of Respondents’ witness Mark Bowden and Petitioners’ witness Lenore Walker shall be admitted into evidence.
2. The Parties further stipulate to the admissibility of the initial disclosures exchanged between the Parties, and to all evidence, including documents, statements, and testimony, contained or otherwise referenced therein. The Parties reserve the right to dispute the proper weight and probative value to be given to this evidence at trial and in any post-trial briefing.

Respectfully submitted,

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